



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: SEPR-F

Mr. Steven Slaten
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

MAR 8 1996

Re: Draft Final Proposed Plan for Operable Unit 3

Dear Mr. Slaten:

EPA has reviewed the Draft Final Proposed Plan for Operable Unit (OU) 3 that DOE submitted on January 5, 1996 and finds it to be generally acceptable. Below are some suggested additions and revisions that EPA recommends for the improvement of the document.

1. Page 3, Operable Unit 3 Location Map. This map could be improved with the addition of a few more features that are important to gaining a better understanding of OU 3. Suggested additions are the new Woman Creek Reservoir, pertinent on site features such as the 903 Pad, Rock Creek, Walnut Creek, Woman Creek, the Industrial Area, and a scale bar. To add these features, it would probably make sense to enlarge the map to a full page and turn it sideways due to the rectangular shape of the area being shown.
2. Page 5, IHSS 200 Great Western Reservoir. This description states that the location of this reservoir is 1-1/2 miles east of the site. The west shore of Great Western Reservoir is actually slightly less than 1/2 mile from the site boundary and the dam on the east side of the reservoir is 1 mile from the site boundary.
3. Page 5, IHSS 202 Mower Reservoir. Delete the phrase "approximately 1-1/2 miles southeast of the Site and" since it is inaccurate and contradictory to the rest of the sentence that correctly states the location as being 1500 feet east of the site boundary.
4. Page 5, Other Activities Affecting OU 3. This section should also briefly discuss the other components of the Option B activities such as Broomfield's new water supply and the future use of Great Western Reservoir for irrigation purposes only.
5. No mention is made in this document regarding the specific sources from which the contaminants in OU 3 originated. The 903 pad release and the Walnut Creek re-engineering project should be briefly described so that readers of the Proposed Plan can better understand how plutonium and americium were transported offsite.

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6. Page 8, Table 2 Summary Table of Plutonium and Americium in Soils. The values shown in this table for the OU 3 means do not appear to be from the same data set as the other values shown in the table. All other values appear to be derived from Table D-5 in the OU 3 Draft RI Report, but the means are taken from Table D-6. The document needs to include values that are all from the same data set, and it should specify which set of samples are being summarized in each table.
7. A summary and table of radionuclide analytical results for sediments should be included in the document. Although it is stated that plutonium is a COC for sediments in Great Western Reservoir and risks are calculated, the analytical results are not summarized as they are for surface water and soils.

Please contact Gary Kleeman at 312-6571 with any questions that you might have regarding these comments.

Sincerely,



Tim Rehder, Manager
Rocky Flats Project

cc: Steve Hahn, Kaiser-Hill
Susan Chaki, CDPHE
Mark Buddy, RMRS
John Rampe, DOE